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10 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 In re:

12 Case No. 19-30088 (DM) (Lead Case)

13 PG&E CORPORATION

14 Chapter 11

15 - and -

16 (Jointly Administered)

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

19 Debtors.

- 20 Affects Both Debtors
21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric
23 Company

24 **JOINDER OF CITY & COUNTY OF
SWANSEA PENSION FUND TO
SECURITIES LEAD PLAINTIFF'S
OBJECTION TO REORGANIZED
DEBTORS' MOTION TO APPROVE
SECURITIES ADR AND RELATED
PROCEDURES FOR RESOLVING
SUBORDINATED SECURITIES CLAIMS
[D.I. 9189]**

1 City & County of Swansea Pension Fund, the holder of a Securities Claim¹ and a creditor
2 in the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized
3 debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by
4 and through its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead*
5 *Plaintiff’s Objection to Reorganized Debtors’ Motion to Approve Securities ADR and Related*
6 *Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities**
7 **ADR Objection**”), in opposition to *Reorganized Debtors’ Motion to Approve Securities ADR*
8 *and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the
9 “**Securities ADR Motion**”). In support of this Joinder, City & County of Swansea Pension
10 Fund, respectfully states as follows:

12 **JOINDER AND RESERVATION OF RIGHTS**

13 1. City & County of Swansea Pension Fund is a Securities Claimant and timely filed
14 proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. F@E!Z27423 and
15 !L!TK27423).

17 2. City & County of Swansea Pension Fund incorporates by reference and hereby joins
18 in all arguments set forth in the Securities ADR Objection.

19 3. City & County of Swansea Pension Fund reserves its right to supplement this
20 Joinder and further reserves its rights to participate in any hearing to consider the Securities
21 ADR Motion, including its rights to make any arguments and to examine witnesses.
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23
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26 _____
27 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
28 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
applicable.

CONCLUSION

For all of the foregoing reasons, City & County of Swansea Pension Fund respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

BARRACK, RODOS & BACINE

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